

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CASE NO.: 11 CR 1032/PAE

MIGUEL STRONG, et. al.,

Defendant(s).

**DEFENDANT'S MOTION FOR A SEPARATE TRIAL AND OTER PRE-TRIAL
MOTIONS**

PLEASE TAKE NOTICE, that upon indictment found against the Defendant, and upon all the proceedings herein, a motion will be made pursuant to Rule 41(e) of the Federal Rules of Criminal Procedure, at a Criminal Term of this Court, at the United States Courthouse, Room 1305, on July 31, 2014, at 9:30 a.m. or as soon thereafter as counsel can be heard, for an order granting defendant's motion for severance, and for such other and further relief as to the Court may seem just and proper.

Dated: New York, New York
July 14, 2014

Respectfully submitted,

/S/ Kafahni Nkrumah

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